

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

vs.

DONNELL RUSSELL,

Defendant.

No. 20-cr-538 (PGG)

**DEFENDANT RUSSELL'S NOTICE OF MOTION *IN LIMINE* TO  
PRECLUDE EXPERT CELL SITE TESTIMONY (MIL NO. 1)**

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law, defendant Donnell Russell, pursuant to Rules 702, 704, 401, 403 of the Federal Rules of Evidence, will move the Court, before the Honorable Paul G. Gardephe at the United States Courthouse, 500 Pearl Street, Courtroom 705, New York, New York 10007, for an Order precluding expert cell site testimony.

Dated: June 27, 2022

/s/ Michael G. Freedman  
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Attorney for Defendant Donnell Russell

## **CERTIFICATE OF SERVICE**

I hereby certify that on June 27, 2022, I caused a true and correct copy of the foregoing to be served by electronic means, via the Court's CM/ECF system, on all counsel registered to receive electronic notices.

/s/Michael G. Freedman  
Michael G. Freedman